PART A OF THE SUPPORTING STATEMENT

1. Identification of the Information Collection

(a) Title and Number of the Information Collection

"Reporting and Recordkeeping Requirements for the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Cellulose Products Manufacturing." This is a new information collection request (ICR), and a U. S. Environmental Protection Agency (EPA) tracking number for this ICR has not been assigned.

(b) Short Characterization

(i) Applicability. Respondents are owners and operators of new and existing sources in the cellulose products manufacturing industry. The cellulose products manufacturing industry includes the Miscellaneous Viscose Processes source category and Cellulose Ethers Production source category. The Miscellaneous Viscose Processes source category includes the cellulose food casing, rayon, cellophane, and cellulosic sponge industry sectors, and the Cellulose Ethers Production source category includes the carboxymethyl cellulose, hydroxyethyl cellulose, hydroxypropyl cellulose, hydroxypropyl methyl cellulose, and methyl cellulose industry sectors.

The cellulose products manufacturing NESHAP includes emission limits, operating limits, and work practice standards for major sources of hazardous air pollutants (HAP). Thirteen existing sources in the cellulose products manufacturing industry (three cellulose food casing, one rayon, one cellophane, four cellulosic sponge facilities, and four cellulose ether facilities) are major sources of HAP and, therefore, will be subject to the major source provisions. The three remaining existing sources in the cellulose products manufacturing industry (three cellulose ether facilities) are not major sources and will

not be subject to the major source provisions. No new major source cellulose products manufacturing facilities are projected to be built within the next 5 years.

(ii) Cellulose products manufacturing facilities. Respondents must choose one of the compliance options described in the rule or install and monitor a specific air pollution control system that reduces HAP emissions to the compliance level. Respondents also are required to install, operate, and maintain a continuous parameter monitoring system (CPMS) for each facility to demonstrate compliance with the operating limits in the rule. Respondents are required to record the values of operating parameters and maintain the averages of those values within the limits established during the performance test or other initial compliance demonstration. Respondents are given the option to use a continuous emissions monitoring system (CEMS) as an alternative to a CPMS. Viscose process respondents are required to prepare and maintain a material balance, which would be used to calculate the percent reduction in emissions and demonstrate compliance with the process vent emission limits in the rule. Cellulose ether respondents are required to comply with the monitoring requirements of 40 CFR part 63, subparts F and G for wastewater systems and 40 CFR part 63, subpart H or UU for equipment leaks to demonstrate compliance with the wastewater and equipment leak standards in the rule.

Respondents are subject to the reporting and recordkeeping requirements described in subpart A of 40 CFR part 63 relating to NESHAP. These requirements include the notification that the facility is subject to the rule; the notification of performance test; the notification of compliance status (including results of performance tests and other initial compliance demonstrations); and semiannual compliance reports. In addition to the requirements of subpart A, cellulose ether respondents are required to comply with the applicable reporting and

recordkeeping requirements of 40 CFR part 63, subparts F and G for wastewater systems, and 40 CFR part 63, subpart H or UU for equipment leaks.

Respondents are to submit all reports to their State or local agency or to the EPA Regional Office, whichever has been delegated enforcement authority by EPA. The information is used to determine whether or not all sources subject to the rule are achieving the emission limits, operating limits, and work practice standards in the rule.

(iii) Deviations from the standard. If respondents identify any deviation resulting from a known cause for which no Federally approved or promulgated exemption from an emission limit, operating limit, or work practice standard applies, the compliance report must also include all records that the facility is required to maintain that pertain to the periods during which such deviation occurred, as well as the following: the magnitude of each deviation; the reason for each deviation; a description of the corrective action taken for each deviation, including action taken to minimize each deviation and action taken to prevent recurrence; and a copy of all quality assurance activities performed on any element of the monitoring protocol.

(iv) Record retention. Respondents must maintain a copy of all operating parameter values that demonstrate compliance with the operating limits in the rule, as well as maintain records of performance tests; startup, shutdown, and malfunction (SSM); monitoring systems; supporting calculations for compliance determinations; and any other information necessary to demonstrate compliance with the emission limits, operating limits, and work practice standards in the rule. Respondents must maintain those records for a minimum of 5 years. At a minimum, respondents must maintain the most recent 2 years of data onsite. Respondents may retain the remaining 3 years of data offsite.

2. Need For and Use of the Collection

(a) Need/Authority for the Collection

The EPA is charged under section 112(d) of the Clean Air Act (CAA), as amended, to establish emission standards for each category or subcategory of major and area sources of HAP listed for regulation in section 112(b). These standards are applicable to new or existing sources of HAP and shall require the maximum degree of emission reduction. The predominant HAP emitted from the Miscellaneous Viscose Processes source category include carbon disulfide, carbonyl sulfide, and toluene. The predominant HAP emitted from the Cellulose Ethers Production source category include ethylene oxide, methanol, methyl chloride, and propylene oxide.

In the Administrator's judgment, the pollutants emitted from the Miscellaneous Viscose Processes source category and the Cellulose Ethers Production source category cause or contribute significantly to air pollution that may reasonably be anticipated to endanger public health. Therefore, these source categories are listed for regulation under section 112. (Note: The original source category list included separate categories for Cellulose Food Casing, Rayon, Cellophane, Methyl Cellulose, Carboxymethyl Cellulose, and Cellulose Ethers. The Cellulose Food Casing, Rayon, and Cellophane source categories have been grouped together with Cellulosic Sponge [a source category not on the original source category list] to create a new "Miscellaneous Viscose Processes" source category. The Methyl Cellulose, Carboxymethyl Cellulose, and Cellulose Ethers source categories have also been grouped together to create a new "Cellulose Ethers Production" source category.)

Section 114(a) of the CAA states that the Administrator may require any owner or operator subject to any requirement of the CAA to:

> ...(A) establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables, or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

The required notifications are used to inform EPA or delegated authority when a source becomes subject to the cellulose products manufacturing NESHAP. The reviewing authority may then inspect the source to determine if the air pollution control devices are properly installed and operated, leaks are being detected and repaired, and the emission limits, operating limits, and work practice standards in the rule are being met. Performance test reports are necessary because they are EPA's record of a source's initial capability to comply with the emission limits and work practice standards, and they serve as a record of the operating conditions under which compliance was achieved. Certain records and reports are necessary to enable the Administrator to identify facilities subject to the cellulose products manufacturing NESHAP and to ensure that the emission limits and work practice standards, which are based on maximum achievable control technology (MACT) for viscose process facilities and cellulose ether facilities, are being achieved.

After their compliance date, all respondents must submit semiannual (every 6 months) compliance reports that contain the information requested in §63.5580 of the rule. The semiannual compliance reports are used for problem identification, as a check on source operation and maintenance (O&M), and for compliance determinations. These records and reports are required under the cellulose products manufacturing NESHAP and

the General Provisions of 40 CFR part 63, subpart A (as authorized under sections 101, 112, 114, 116, and 301 of the CAA as amended by Pub. L 101-549 [42 U.S.C. 7401, 7412, 7414, 7416, 7601]).

(b) Practical Utility/Users of the Data

The information will be used by EPA enforcement personnel to (1) identify new, modified, reconstructed, and existing sources subject to the rule; (2) ensure that MACT is being properly applied; and (3) ensure that the air pollution control devices are being properly operated and maintained on a continuous basis.

In addition, records and reports are necessary to enable EPA to identify facilities subject to the cellulose products manufacturing NESHAP that are not in compliance with the emission limits, operating limits, and work practice standards in the rule. Based on reported information, EPA can decide which cellulose products manufacturing facilities should be inspected and which records or processes should be inspected at those facilities. The records that facilities maintain will indicate to EPA whether the facility personnel are in compliance with the emission limits, operating limits, and work practice standards.

Much of the information EPA needs to determine compliance would be recorded on a continuous, hourly, or daily basis. Other information would be recorded on a monthly, semiannual, or other basis. Such information would be reviewed by enforcement personnel during an inspection and would need to be reported on a semiannual basis.

3. Nonduplication, Consultations, and Other Collection Criteria

(a) Nonduplication

Certain reports required by State or local agencies may duplicate information required by the cellulose products manufacturing NESHAP (e.g., reports of performance tests). In such cases, a copy of the report submitted to the State or local agency can be provided to the Administrator in lieu of the report required by the rule.

A search of existing rules revealed some duplication of information-gathering efforts in those cases where facilities are subject to other rules in addition to the cellulose products manufacturing NESHAP. In each case that has been identified, an effort has been made to eliminate this duplication. Two examples of these efforts are provided below.

The cellulose products manufacturing NESHAP allows facilities that are also subject to the provisions of 40 CFR parts 264 and/or 265 to comply with those provisions (which constitutes compliance with the requirements of the rule) or with the provisions of the rule. If facilities comply with the provisions of 40 CFR parts 264 and/or 265, then they must report the information required under §63.5580 of the rule and identify in the notification of compliance status required by §63.5575 the recordkeeping and reporting authority under which they will comply.

Also noted in the cellulose products manufacturing NESHAP, facilities with an affected wastewater stream that is also subject to the provisions of 40 CFR parts 260 through 272 may determine whether the NESHAP or 40 CFR parts 260 through 272 contain the more stringent requirements. Compliance with provisions of 40 CFR parts 260 through 272 that are determined to be more stringent than the requirements of the NESHAP constitutes compliance with the NESHAP. In the notification of compliance

status required by §63.5575, the facilities must identify the more stringent provisions of 40 CFR parts 260 through 272 with which they will comply, as well as provide the information and procedures that they used to make any stringency determinations.

(b) Consultations

The EPA published a list of categories of major and area sources of HAP on July 16, 1992 (57 FR 21592), under authority of section 112(c); this notice listed most of the various source categories comprising the Miscellaneous Viscose Processes and Cellulose Ethers Production source categories as categories of major sources of HAP. (As noted above, the Cellulose Food Casing, Rayon, and Cellophane source categories have been grouped together with Cellulosic Sponge [a source category not on the original source category list] to create a new "Miscellaneous Viscose Processes" source category. The Methyl Cellulose, Carboxymethyl Cellulose, and Cellulose Ethers source categories have also been grouped together to create a new "Cellulose Ethers Production" source category.)

Representatives of the affected companies, their consultants, air pollution control device vendors, State environmental agencies, and a Federal government agency were consulted during the development of the rule, and 14 meetings were held with them during this time. Table 1 presents a list of the names, affiliations, and telephone numbers of persons that provided input during development of the rule. (The list includes the latest contact names and telephone numbers and excludes those no longer pertinent to the development of the rule.) During the meetings, the representatives were given opportunities to comment on the regulatory approach. The major topics of these discussions included the applicability, MACT floor approach, regulatory strategies, and cost and environmental

impacts of the rule. No specific information was provided to the representatives with respect to burden estimates.

TABLE 1. CELLULOSE PRODUCTS MANUFACTURING CONSULTATIONS

Name	Affiliation	Telephone number
Penny Lassiter	U.S. Environmental Protection Agency	(919) 541-5396
William Schrock	U.S. Environmental Protection Agency	(919) 541-5032
Val Schaeffer	U.S. Occupational Safety and Health Administration	(202) 693-2092
Sherri Clark	American Chemistry Council–Carbon Disulfide Panel	(703) 741-5000
Lynn Bergeson	Bergeson & Campbell P.C.	(202) 962-8577
Jack Webster	Devro-Teepak, Inc.	(217) 446-6460, ext. 5312
David Gustafson	Dow Chemical Co.	(517) 636-2953
Bruce Alexius	Dow Chemical Co.	(225) 353-8844
William Fucich	Envirogen, Inc.	(609) 936-9300
Glennis Kanour	Hercules Inc.	(804) 541-4300
Dave Van Derveer	Hercules Inc.	(908) 254-1234, ext. 215
William South	Lenzing Fibers Corp.	(423) 585-4805
Stuart Andrews	MAK Chemical Corp.	(765) 288-4464
Joseph Enneking	NUCON International, Inc.	(614) 846-5710
Dominique Alibeckoff	Nylonge Corp.	(216) 323-6161
David Savage	Penn Carbose, Inc.	(814) 443-1611, ext. 11
Sunil Kapoor	Program Management Co.	(703) 748-3433
Kathryn Larkins	Shook, Hardy, & Bacon L.L.P.	(913) 663-8913
Robert Beuerlein	Spontex, Inc.	(931) 540-2151
Gregory Stubbs	3M Corp.	(716) 871-6281
Charlie Connell	3M Corp.	(608) 326-2466, ext. 3321
Michelle Probasco	UCB Films, Inc.	(785) 379-0571
Robert Odewald	Viskase Corp.	(630) 455-4485
Hank Naour	Illinois Environmental Protection Agency	(217) 782-2113
Jackie Surles	Louisiana Department of Environmental Quality	(225) 765-0219
Nick Zabrodsky	Michigan Department of Environmental Quality	(517) 373-4921
Alfred Azevedo	West Virginia Department of Environmental Protection	(304) 926-3727, ext. 316

(c) Effects of Less Frequent Collection

In the 3 years after the effective date of the rule, existing sources will submit only one-time notifications to EPA. In this instance, less frequent reporting would not be practical because EPA needs the information provided in these one-time notifications. In addition to these one-time notifications, existing sources will also submit semiannual compliance reports in the years after their compliance date. If the relevant information were collected less frequently, the EPA would not be reasonably assured that the sources are applying good O&M practices and meeting the emission limits, operating limits, and work practice standards in the rule. Less frequent collection could decrease the likelihood of detecting poor O&M of control equipment and long-term deviations from the applicable emission limits, operating limits, and work practice standards.

In addition, EPA's authority to take administrative action would be significantly reduced. Section 113(d) of the CAA limits the assessment of administrative penalties to violations that occur no more than 12 months before initiation of the administrative proceeding. Because administrative proceedings are less costly and require fewer resources than judicial proceedings, both EPA and the regulated community benefit from preservation of EPA's administrative powers.

Also, the reporting frequency in the NESHAP is consistent with the requirements of title V permit programs. Consequently, less frequent reports would not result in a lower burden.

(d) General Guidelines

The cellulose products manufacturing NESHAP requires owners or operators of a facility to retain records for a period of 5 years, which exceeds the 3-year retention period contained in the general information collection guidelines in 5 CFR 1320.6(f) of the Office of Management and Budget (OMB) regulations

implementing the Paperwork Reduction Act. However, the 5-year retention period is consistent with the retention requirement in the General Provisions to 40 CFR part 63 and the retention requirement in the operating permit program under 40 CFR part 70. All of the facilities subject to the rule would be required to obtain operating permits either through the State-approved permitting program or, if one does not exist, in accordance with the provisions of 40 CFR part 71. Thus, the 5-year record retention requirement of the rule would add no additional burden. At a minimum, respondents would be required to retain on site the most recent 2 years of data. Respondents could retain the remaining 3 years of data at a readily accessible onsite or offsite storage facility. None of the other guidelines in 5 CFR 1320.6 are being exceeded.

(e) Confidentiality

All information submitted to EPA for which a claim of confidentiality is made will be safeguarded according to EPA policies set forth in Title 40, Chapter 1, Part 2, Subpart B--Confidentiality of Business Information. (See 40 CFR part 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 8, 1978; 43 FR 42251, September 28, 1978; and 44 FR 17674, March 23, 1979.)

(f) Sensitive Questions

The information to be reported consists of emissions data and other information that are not of a sensitive nature. Therefore, this section is not applicable because this ICR does not involve matters of a sensitive nature.

4. The Respondents and the Information Requested

(a) Respondents/NAICS Codes

Respondents are owners or operators of cellulose food casing, rayon, cellophane, cellulosic sponge, and cellulose ether facilities that are classified as major sources under section 112 of the CAA. The following table lists the North American Industrial Classification System (NAICS) codes used to classify the respondents affected by the cellulose products manufacturing NESHAP. Not all processes classified in the NAICS codes in the table below will be regulated by the cellulose products manufacturing NESHAP (i.e., they will not be regulated if they are already subject to another NESHAP).

Regulated entity	NAICS code and description
Cellulose food casing facilities	326121 - Unsupported Plastics Profile Shape Manufacturing
Cellophane facilities	326199 - All Other Plastics Product Manufacturing
Cellulosic sponge facilities	326199 - All Other Plastics Product Manufacturing
	325211 - Plastics Material and Resin Manufacturing
Rayon facilities	325221 - Cellulosic Organic Fiber Manufacturing
Cellulose ether facilities	325199 - All Other Basic Organic Chemical Manufacturing

(b) Information Requested

(i) Data items, including recordkeeping requirements. Attachment 1, Source Data and Information Requirements, summarizes the reporting and recordkeeping requirements.

(ii) Respondent activities. The respondent activities required by the rule for existing major sources for the first and third years after the effective date of the rule are listed in Tables 2a and 2b, respectively, and are presented in section 6(a). The EPA does not expect any respondent activities for existing major sources for the second year after the effective date of the rule. The respondent activities are described in more detail in Attachment 2, Description of Respondent Activities. No new major source cellulose products manufacturing facilities are projected to be built within the next 5 years.

TABLE 2a. ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS–FIRST YEAR AFTER THE EFFECTIVE DATE

Burden item	(A) Technical hours per occurrence	(B) Occurrences per respondent per year	(C) Technical hours per respondent per year (C = A * B)	(D) Respondents per year [a]	(E) Technical hours per year (E = C * D)	(F) Management hours per year (F = E * 0.05)	(G) Clerical hours per year (G = E * 0.1)	(H) Respondent hours per year (H = E + F + G)	(I) Labor cost, $ [b]
1. Applications	N/A								
2. Surveys and studies	N/A								
3. Reporting requirements									
A. Read instructions	4	1	4	13	52	3	5	60	$2,829
B. Required activities	N/A								
C. Create information	Included in 3E								
D. Gather existing information	Included in 3E								
E. Write report									
• Notification of applicability	2	1	2	13	26	1	3	30	$1,414
4. Recordkeeping requirements									
A. Read instructions	Included in 3A								
B. Plan activities	N/A								
C. Implement activities	N/A								
D. Develop record system	N/A								
E. Time to enter information	N/A								
F. Time to train personnel	N/A								
G. Time for audits	N/A								
Total burden and cost nationwide (salary) [c]					78	4	8	90	$4,243
Average cost per facility [d]				13					$326

[a] There are 13 existing major source cellulose products manufacturing facilities, which include 3 cellulose food casing, 1 rayon, 1 cellophane, 4 cellulosic sponge, and 4 cellulose ether facilities. No new major source cellulose manufacturing facilities are projected to be built within the next 5 years.

[b] Costs assume a rate of $47.75/hour for technical labor, $72.58/hour for management labor, and $30.18/hour for clerical labor.

[c] The annual burden and cost are equal to the hours added down each column for technical, management, and clerical labor and the sum of the cost column.

[d] The average cost per facility is calculated by dividing the total cost by the number of facilities (13) subject to the standards.

TABLE 2b. ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS--THIRD YEAR AFTER THE EFFECTIVE DATE

Burden item	(A) Technical hours per occurrence	(B) Occurrences per respondent per year	(C) Technical hours per respondent per year (C = A * B)	(D) Respondents per year [a]	(E) Technical hours per year (E = C * D)	(F) Management hours per year (F = E * 0.05)	(G) Clerical hours per year (G = E * 0.1)	(H) Respondent hours per year (H = E + F + G)	(I) Labor cost, $ [b]
1. Applications	N/A								
2. Surveys and studies	N/A								
3. Reporting requirements									
A. Read instructions	N/A								
B. Required activities	N/A								
C. Create information	Included in 3E								
D. Gather existing information	Included in 3E								
E. Write report									
• Notification of initial performance test [c]	2	1	2	14	28	1	3	32	$1,523
4. Recordkeeping requirements									
A. Read instructions	Included in 3A								
B. Plan activities	N/A								
C. Implement activities	N/A								
D. Develop record system [d]	40	1	40	13	520	26	52	598	$28,286
• Develop SSM plan [e]	100	1	100	13	1,300	65	130	1,495	$70,716
• Develop site-specific monitoring plan [f]	100	1	100	13	1,300	65	130	1,495	$70,716
E. Time to enter information	N/A								
F. Time to train personnel [g]	40	1	40	13	520	26	52	598	$28,286
G. Time for audits	N/A								
Total burden and cost nationwide (salary) [h]					3,668	183	367	4,218	$199,528
Average cost per facility [i]				13					$15,348

[a] There are 13 existing major source cellulose products manufacturing facilities, which include 3 cellulose food casing, 1 rayon, 1 cellophane, 4 cellulosic sponge, and 4 cellulose ether facilities. No new major source cellulose manufacturing facilities are projected to be built within the next 5 years.

[b] Costs assume a rate of $47.75/hour for technical labor, $72.58/hour for management labor, and $30.18/hour for clerical labor.

[c] Respondents per year are based on 6 viscose process facilities conducting a performance test for their process vents and 4 cellulose ether facilities conducting separate performance tests for their process vents and wastewater systems, with the facilities submitting a separate notification of performance test for each performance test conducted at the facility.

TABLE 2b. (continued)

[d] Hours per occurrence assume 40 hours to develop a record system for recording parameter monitoring information.
[e] Hours per occurrence assume one person would take 2 weeks (80 hours) to draft the SSM plan and then another 20 hours of review/revisions, for a total of 100 hours.
[f] Hours per occurrence assume one person would take 2 weeks (80 hours) to draft the site-specific plan and then another 20 hours of review/revisions, for a total of 100 hours.
[g] Assume 40 hours to train personnel.
[h] The annual burden and cost are equal to the hours added down each column for technical, management, and clerical labor and the sum of the cost column.
[i] The average cost per facility is calculated by dividing the total cost by the number of facilities (13) subject to the standards.

5. The Information Collected--Agency Activities, Collection Methodology, and Information Management

(a) Agency Activities

The Agency activities for the first and third years after the effective date of the rule are listed in Tables 3a and 3b, respectively, and are presented in section 6(c). The EPA does not expect any Agency activities for the second year after the effective date of the rule.

(b) Collection Methodology and Management

Information contained in the initial, one-time-only notifications will be entered in the National Emissions Trends (NET) database operated and maintained by EPA's Office of Air Quality Planning and Standards (OAQPS). The NET database is EPA's database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for industrial and government-owned facilities. The EPA uses the NET database for tracking air pollution compliance and enforcement by State and local agencies and EPA Regional Offices and Headquarters. The EPA and its delegated authorities can edit, store, retrieve, and analyze the data. The NET database can be publicly accessed via the Internet from Envirofacts at http://www.epa.gov/enviro/index_java.html or through a Freedom of Information Act request to EPA. Data obtained during periodic visits by EPA personnel, from records maintained by the respondents, and from information provided in semiannual reports will be tabulated and published for internal EPA use in compliance and enforcement programs.

TABLE 3a. ANNUAL AGENCY BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS--FIRST YEAR AFTER THE EFFECTIVE DATE

Burden item	(A) Hours per occurrence	(B) Occurrences per year	(C) Hours per facility per year (C = A * B)	(D) Facilities per year [a]	(E) Technical hours per year (E = C * D)	(F) Management hours per year (F = E * 0.05)	(G) Clerical hours per year (G = E * 0.1)	(H) Agency hours per year (H = E + F + G)	(I) Labor cost per year, $ [b]
1. Attend initial performance test	N/A								
2. Attend repeat performance test	N/A								
3. Litigation	N/A								
4. Excess emissions–enforcement activities	N/A								
5. Report review									
A. Review notification of applicability	2	1	2	13	26	1	3	30	$1,414
Total burden and cost (salary) [c]					26	1	3	30	$1,414
Travel expenses for tests attended									$0
Total annual cost = total cost (salary) + travel expenses									$1,414

[a] There are 13 existing major source cellulose products manufacturing facilities, which include 3 cellulose food casing, 1 rayon, 1 cellophane, 4 cellulosic sponge, and 4 cellulose ether facilities. No new major source cellulose manufacturing facilities are projected to be built within the next 5 years.

[b] Costs assume a rate of $47.75/hour for technical labor, $72.58/hour for management labor, and $30.18/hour for clerical labor.

[c] The annual burden and cost are equal to the hours added down each column for technical, management, and clerical labor and the sum of the cost column.

TABLE 3b. ANNUAL AGENCY BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS--THIRD YEAR AFTER THE EFFECTIVE DATE

Burden item	(A) Hours per occurrence	(B) Occurrences per year	(C) Hours per facility per year (C = A * B)	(D) Facilities per year [a]	(E) Technical hours per year (E = C * D)	(F) Management hours per year (F = E * 0.05)	(G) Clerical hours per year (G = E * 0.1)	(H) Agency hours per year (H = E + F + G)	(I) Labor cost per year, $ [b]
1. Attend initial performance test	N/A								
2. Attend repeat performance test	N/A								
3. Litigation	N/A								
4. Excess emissions–enforcement activities	N/A								
5. Report review									
A. Review notification of initial performance test [c]	2	1	2	14	28	1	3	32	$1,523
Total burden and cost (salary) [d]					28	1	3	32	$1,523
Travel expenses for tests attended									$0
Total annual cost = total cost (salary) + travel expenses									$1,523

[a] There are 13 existing major source cellulose products manufacturing facilities, which include 3 cellulose food casing, 1 rayon, 1 cellophane, 4 cellulosic sponge, and 4 cellulose ether facilities. No new major source cellulose manufacturing facilities are projected to be built within the next 5 years.

[b] Costs assume a rate of $47.75/hour for technical labor, $72.58/hour for management labor, and $30.18/hour for clerical labor.

[c] Facilities per year are based on 6 viscose process facilities conducting a performance test for their process vents and 4 cellulose ether facilities conducting separate performance tests for their process vents and wastewater systems, with the facilities submitting a separate notification of performance test for each performance test conducted at the facility.

[d] The annual burden and cost are equal to the hours added down each column for technical, management, and clerical labor and the sum of the cost column.

The cellulose products manufacturing NESHAP does not require the use of automated, electronic, mechanical, or other technological data collection techniques or other forms of information technology. Although many of the large companies may have elaborate collection methods, automated systems are not expected to reduce the burden.

(c) Small Entity Flexibility

Minimizing the information collection burden for all sizes of organizations is a continuing effort by EPA. The EPA has reduced the reporting and recordkeeping burden for respondents to include only the information that EPA needs to determine compliance with the cellulose products manufacturing NESHAP.

Nine companies own the 13 major source facilities in the cellulose products manufacturing industry. Only one of these companies meets the applicable definition of a small business (i.e., fewer than 500 employees for NAICS code 326199). The EPA does not expect that this company will experience adverse impacts related to the cost of the required reporting and recordkeeping.

(d) Collection Schedule

Collection of data will begin after the effective date of the cellulose products manufacturing NESHAP. The schedule for reports required by the NESHAP is summarized below.

For all existing sources, the initial notification stating that the source is subject to the rule must be submitted no later than 4 months (120 days) after the effective date of the rule. New or reconstructed sources for which startup occurs on or after the effective date of the rule must submit the initial notification no later than 120 days after the source becomes subject to the rule. New or reconstructed sources must comply immediately upon the effective date of the rule if their startup

date is before the effective date of the rule or upon startup if the startup date is on or after the effective date of the rule.

Sources required to conduct a performance test must submit a notification of intent to conduct a performance test at least 60 days before the performance test is scheduled to begin. The sources must conduct the performance test or other initial compliance demonstration no later than 180 days after their compliance date. The sources must submit the notification of compliance status, containing the results of the performance test or other initial compliance demonstration, no later than 240 days after their compliance date.

Following their compliance date, sources must compile on a daily basis those records necessary to demonstrate compliance, and they must submit compliance reports on a semiannual basis to the Administrator, as discussed in section 1(b).

6. Estimating the Burden and Cost of the Collection

(a) Estimating Respondent Burden

The annual burden estimates for reporting and recordkeeping activities for existing major sources for the first and third years after the effective date of the rule are presented in Tables 2a and 2b, respectively. The EPA does not expect any respondent burden for existing major sources for the second year after the effective date of the rule. The burden estimates in each table were derived from estimates based on EPA's experience with similar information collection requirements in other standard development efforts.

(b) Estimating Respondent Costs

(i) Estimating labor costs. The annual labor costs for reporting and recordkeeping activities for existing major sources for the first and third years after the effective date of the rule are also presented in Tables 2a and 2b, respectively. The costs of these activities are based on data from the U. S. Bureau of Labor Statistics. Labor costs are divided into the following three categories: (1) technical, (2) management, and (3) clerical. The cost of technical labor is estimated at $47.75 per hour ($47.75/hr), the cost of management labor at $72.58/hr, and the cost of clerical labor at $30.18/hr. These estimates include fringe benefits, overhead, and profit rate. The labor costs are in March 2000 dollars.

(ii) Estimating capital and O&M costs. There are two types of non-labor-related costs associated with information collection activities--capital costs and O&M costs. The methods used to estimate the capital and O&M costs for this ICR are presented in Attachment 3, Methods Used in Cost Estimates.

One-time capital costs usually include any produced physical good, such as computers, machinery, or equipment, that must be

purchased for the specific purpose of satisfying EPA's reporting or recordkeeping requirements. Capital costs are usually incurred only once, at the beginning of an information collection period. A one-time capital cost can be estimated over multiple years by annualizing the cost using an OMB-approved discount rate. For this ICR, capital costs were annualized using an interest rate of 7 percent. In most cases, administrative charges, insurance, and property taxes were also included with the annualized capital costs, estimated at 4 percent of the capital cost.

The capital costs associated with monitoring equipment include the monitoring equipment, data acquisition system, computer, logging and reporting software, printer, and ancillary costs, such as planning, selecting the equipment, providing support facilities, installing and checking the equipment, establishing operating parameters, and preparing a QA/QC plan. Capital and annualized capital costs associated with monitoring equipment are expected to be incurred in the third year after the effective date of the rule as existing facilities purchase, install, and verify their monitoring equipment prior to their compliance date.

The capital costs associated with file cabinets for storing collected data and reports include the purchase of one standard four-drawer file cabinet for each facility (assume $235 per file cabinet). The average annualized capital cost per facility for file cabinets is $35. Capital and annualized capital costs associated with file cabinets are expected to be incurred in the third year after the effective date of the rule as existing facilities develop their record systems prior to their compliance date.

Costs for performance testing are also considered capital costs because it is expected that facilities will hire a contractor to conduct the test. However, no performance tests

are expected to be conducted in the first 3 years after the effective date of the rule.

Operation and maintenance costs include those costs associated with the general upkeep of capital equipment, such as monitoring equipment. Those costs would include monitoring labor, maintenance materials and supplies, recordkeeping and reporting, and overhead for the monitoring equipment. Because existing facilities are expected to be purchasing, installing, and checking out their monitoring equipment in the third year after the effective date of the rule, no monitoring O&M costs are expected to be incurred until the following year.

Operation and maintenance costs also include the costs associated with a paperwork requirement incurred continuously over the life of the ICR. For example, the O&M costs for rules that require respondents to maintain records and submit reports to EPA should be estimated as costs for file storage, photocopying, and postage. File storage and photocopying costs per response are estimated at 0.5 hour of clerical labor at a wage rate of $30.18/hr. First class postage is estimated at $7.63 per response for mailing to regulatory agencies. File storage, photocopying and postage costs will be applied to the 13 responses (notifications of applicability) submitted during the first year after the effective date of the rule and the 14 responses (notifications of performance test) submitted during the third year. The EPA does not expect any responses to be submitted during the second year after the effective date of the rule. (The number of responses was determined based on the number of notifications submitted to EPA by respondents, as shown in Tables 2a and 2b.)

(c) Estimating Agency Burden and Costs

Because the information collection requirements are developed as an incidental part of the cellulose products manufacturing NESHAP, no costs can be attributed to the development of these requirements.

In addition, the Federal Government will incur no operational costs because reporting and recordkeeping requirements on the part of the respondents are required under section 112 of the CAA. Publication and distribution of the information are part of the NET database, with the result that no Federal costs can be attributed to the ICR.

Examination of records to be maintained by the respondents will occur incidentally as part of the periodic inspection of facilities. Periodic inspections are part of EPA's overall compliance and enforcement program. Therefore, this examination is not attributable to the ICR.

The only costs that the Federal Government will incur are user costs associated with the analysis of the information reported by the respondents in one-time notifications and semiannual compliance reports (unless the compliance report indicates a deviation, thereby triggering an enforcement action). Tables 3a and 3b present the estimated annual burden to the Agency for the first and third years, respectively, after the effective date of the rule. The EPA does not expect any Agency burden for the second year after the effective date of the rule. Labor costs are based on estimated wage rates of $47.75/hr for technical labor, $72.58/hr for management labor, and $30.18/hr for clerical labor. The labor costs are in March 2000 dollars.

(d) Estimating the Respondent Universe and Total Burden and Costs

Once the burden and costs per activity have been established on a per respondent basis, the total burden and cost must be calculated for all respondents and for the Agency. To calculate the total burden and costs, the number of respondents needed to complete each information collection activity must be estimated. The total number of respondents is also referred to as the "respondent universe." The respondent universe varies among the activities listed because not all respondents must complete each activity.

In calculating respondent burden, EPA estimates that 13 major source cellulose products manufacturing facilities will be required to submit notifications of applicability, 10 facilities will be required to submit notifications of their process vent performance tests, and 4 facilities will be required to submit notifications of their wastewater performance tests. In calculating Agency burden, EPA estimates that EPA personnel will conduct reviews of 13 notifications of applicability and 14 notifications of performance tests.

To determine the burden for each activity for technical staff, the number of hours per respondent is multiplied by the number of respondents. Management and clerical labor hours are calculated at 5 percent and 10 percent of technical labor hours, respectively. The total burden is determined by summing the technical, management, and clerical burden estimates. To determine the total labor cost, the burden estimates for technical, management, and clerical labor are multiplied by their respective labor rates and then summed.

(e) Bottom Line Burden Hours and Cost Tables

(i) Respondent tally. The annual bottom line respondent burden hours and costs were calculated by adding the total hours and costs from Tables 2a and 2b and then dividing by the 3-year review period. The total annual burden hours and costs are summarized as follows:

Burden table	Total burden, hours	Total cost, $
Table 2a (first year)	90	$4,243
Table 2b (third year)	4,218	$199,528
Total	4,308	$203,771
Bottom line annual burden	1,436	$67,924

The bottom line annual burden, averaged over the 3-year review period, is 1,436 labor hours, at a cost of $67,924. The bottom line annual burden is presented in Box 13c of OMB 83-I. The average annual burden per respondent, based on 13 respondents nationwide, is 110 labor hours, at a cost of $5,225. The average number of respondents is presented in Box 13a of OMB 83-I.

There are an estimated 9 total annual responses for the first 3 years after the effective date of the rule. The total annual responses are based on an estimated 13 one-time notifications of applicability submitted during the first year, no notifications submitted during the second year, and 14 one-time notifications of performance test submitted during the third year. It is assumed that 20 percent of all notifications and reports will be collected electronically. The total annual responses and the percent of responses collected electronically are presented in Boxes 13b and 13b.1 of OMB 83-I.

The total capital cost for the 3 years after the effective date of the rule is estimated to be $596,671 for the monitoring equipment and $3,055 for the file cabinets used to store collected data and reports. Summing the capital costs for the monitoring equipment and file cabinets results in a total capital

cost of $599,726 for the 3 years after the effective date of the rule.

The average annualized capital cost for the 3 years after the effective date of the rule is $56,465 for the monitoring equipment and $152 for the file cabinets. Summing the average annualized capital costs for the monitoring equipment and file cabinets results in a total annualized capital cost of $56,616 for the 3 years after the effective date of the rule. The annual O&M cost, which includes file storage, photocopying, and postage for the responses, averages $204 for the 3 years after the effective date of the rule. Summing the total annualized capital cost with the annual O&M cost results in a total annualized cost of $56,821 for the 3 years after the effective date of the rule. The total annualized capital cost, annual O&M cost, and total annualized cost are presented in Boxes 14a, 14b, and 14c, respectively, of OMB 83-I.

A discussion of the respondent burden and costs in later years is provided in Attachment 4, Burden and Cost of Reporting and Recordkeeping Requirements for the Fourth, Fifth, and Sixth Years After the Effective Date.

(ii) The Agency tally. The annual bottom line Agency burden hours and costs were calculated by adding the total hours and costs from Tables 3a and 3b and then dividing by the 3-year review period. The annual burden hours and costs are summarized as follows:

Burden table	Total burden, hours	Total cost, $
Table 3a (first year)	30	$1,414
Table 3b (third year)	32	$1,523
Total	62	$2,937
Bottom line annual burden	21	$979

The bottom line annual burden, averaged over the 3-year review period, is 21 labor hours, at a cost of $979. A discussion of the Agency burden and costs in later years is provided in Attachment 4, Burden and Cost of Reporting and Recordkeeping Requirements for the Fourth, Fifth, and Sixth Years After the Effective Date.

(iii) The complex collection. This section does not apply because this collection is a simple collection.

(iv) Variations in the annual bottom line. The annual burden hours and costs vary over the course of the 3-year review period because existing sources are subject to different requirements in each year as follows: (1) in the first year, determining applicability, notifying EPA that the facility is subject to the rule, and reading instructions; (2) no requirements in the second year; and (3) in the third year, notifying EPA of upcoming performance tests, training personnel, and developing record systems, SSM plans, and site-specific monitoring plans. The Agency burden hours and costs will also vary over the 3-year review period because they will be reviewing the following notifications from existing sources: (1) the notifications of applicability of the rule in the first year; (2) no review in the second year; and (3) the notifications of performance tests in the third year.

(f) Reasons for Change in Burden

This section does not apply because this collection is a new collection.

(g) Burden Statement

(i) The EPA is required under section 112(d) of the CAA to regulate emissions of HAP listed in section 112(b).

(ii) The respondents would be subject to applicable recordkeeping, reporting, and other requirements in 40 CFR 63.9 and 63.10 of the General Provisions for the part 63 rules.

(iii) Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to (1) review instructions; (2) develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; (3) adjust the existing ways to comply with any previously applicable instructions and requirements; (4) train personnel to be able to respond to a collection of information; (5) search data sources; (6) complete and review the collection of information; and (7) transmit or otherwise disclose the information.

(iv) The information is needed as part of the overall compliance and enforcement program. The information in the initial, one-time-only reports will be stored in EPA's NET database and will be available to stakeholders.

(v) The total annual reporting and recordkeeping burden and cost for this collection, averaged over the first 3 years after the effective date of the rule, are estimated to be 1,436 labor hours and $67,924. The average burden and cost, per respondent, are 110 labor hours and $5,225. These burden and cost estimates include submitting one-time notifications of applicability and performance test, reading instructions, training personnel, and developing a record system, SSM plan, and site-specific monitoring plan.

(vi) The total capital cost for monitoring equipment and file cabinets for the 3 years after the effective date of the rule is $599,726. The annualized capital cost, averaged over the 3 years after the effective date of the rule, is $56,616. The

annual O&M cost for file storage, photocopying, and postage, averaged over the 3 years after the effective date of the rule, is $204. Summing the annualized capital cost with the annual O&M cost results in a total annualized cost of $56,821 for the 3 years after the effective date of the rule.

(vii) An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in a table in 40 CFR part 9. The EPA will amend part 9 when the ICR is approved.

(viii) Send comments on EPA's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques, to the Director, Office of Environmental Information, Collection Strategies Division (2822), U. S. Environmental Protection Agency, 1200 Pennsylvania Avenue NW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street NW, Washington, DC 20503, marked "Attention: Desk Officer for EPA." Include the EPA ICR number and OMB control number in any correspondence.

(ix) All information submitted to EPA for which a claim of confidentiality is made will be safeguarded according to EPA policies set forth in Title 40, Chapter 1, Part 2, Subpart B--Confidentiality of Information (see 40 CFR part 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 8, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

PART B OF THE SUPPORTING STATEMENT

This section does not apply because statistical methods are not used in the data collection associated with this regulation.

4 attachments

ATTACHMENT 1

Source Data and Information Requirements

SOURCE DATA AND INFORMATION REQUIREMENTS

Requirement	Regulation citation	General Provisions/ other regulation citation
NOTIFICATIONS		
Initial notifications	63.5575	63.9(b)(1)-(5)
Notification of performance test	63.5575	63.7(b), 63.9(e)
Notification of compliance status (including results of performance test, CEMS performance evaluation, or other initial compliance demonstration)	63.5575	63.9(h)(1)-(6) and (j), 63.10(d)(2) and (e)(2)
Notifications for equipment leaks	63.5575	63.182(a)(1) and (2), (b), and (c)(1)-(3), or §63.1039(a)
Notifications for wastewater	63.5575	63.146(a)(1) and (2) and (b), 63.151, 63.152(a)(1)-(3) and (b)(1)-(5)
REPORTS		
Semiannual compliance reports Deviations/out-of-control operation Startup, shutdown, and malfunction Changes in information Equipment leaks Wastewater Closed-vent system Bypass lines Heat exchanger systems Storage vessel control device maintenance	63.5580	 63.10(e)(3) 63.10(d)(5) 63.9(j) 63.182(a)(3) and (6) and (d)(2)-(4), or 63.1039(b) 63.146(c)-(e), 63.152(a)(4) and (5) and (c)-(e) 63.148(j)(1) 63.148(j)(2) and (3) 63.104(f)(2)(i)-(iv)
RECORDS		
Record retention	63.5590	63.10(b)(1)
Documentation supporting initial notification and notification of compliance status	63.5585	63.10(b)(2)(xiv)
Records of performance tests, CEMS performance evaluations, and other initial compliance demonstrations	63.5585	63.10(b)(2)(viii)
Records of startup, shutdown, and malfunction (including startup, shutdown, and malfunction plan)	63.5515, 63.5585	63.6(e)(3), 63.10(b)(2)(i)-(v)
Site-specific monitoring plan	63.5545, 63.5585	63.8(d)(2)
Records for each continuous emissions monitoring system	63.5585	63.8(d)(3), 63.8(f)(6)(i), 63.10(b)(2)(vi)-(xi), 63.10(c)
Records for each continuous parameter monitoring system	63.5585	63.10(b)(2)(vi)-(xi), 63.10(c)
Records of closed-loop systems	63.5585	

SOURCE DATA AND INFORMATION REQUIREMENTS (continued)

Requirement	Regulation citation	General Provisions/ other regulation citation
Records of nitrogen systems	63.5585	
Records of material balances	63.5585	
Records of calculations	63.5585	
Records for extended cookout	63.5585	
Records for equipment leaks	63.5585	63.181 or 63.1038
Records for wastewater	63.5585	63.105, 63.147, 63.152(f) and (g)
Records for closed-vent systems	63.5585	63.148(i)
Records for bypass lines	63.5585	
Records for heat exchanger systems	63.5585	63.104(f)(1)
Records for storage vessel control device maintenance	63.5585	
Records for safety devices	63.5585	

ATTACHMENT 2

Description of Respondent Activities

DESCRIPTION OF RESPONDENT ACTIVITIES

(1) Read Instructions represents the activities, less training, which involve comprehending the provisions in the standards and understanding how they apply to the respective emission points at a cellulose products manufacturing facility.

(2) Create Information represents the activities involving testing, retesting, establishing operating parameter limits, and analyzing point-by-point applicability. Monitor-related refit, calibration, and maintenance activities are also included under this heading. Because respondents are expected to hire outside contractors to conduct the performance tests, these activities are not included in the burden tables. Instead, the costs associated with the performance test are included as capital costs and are discussed in the text.

(3) Gather Existing Information represents the activities involving physical inspections of equipment, collection of monitored data, and other related activities. These activities do not include the monitoring of equipment leak components, which is included as part of the leak detection and repair program.

(4) Write Reports represents the activities normally associated with filling out forms. Since the rule requires no standard forms, these activities relate to the preparation of formal reports and cover letters, as appropriate.

(5) Plan Activities represents such burdens as design, redesign, and scheduling, as well as drafting the implementation plan, and selecting methods of compliance. The costs for planning and selection are included in the capital costs for the performance test, as explained in item (2) above.

(6) Enter Information represents the activities that involve analysis of the information collected for accuracy, compliance, and appropriate reports and records required as a result.

(7) Train Personnel represents the activities involved in communicating specific definitions, compliance options, and other requirements, such as recordkeeping, monitoring, and reporting. An average cellulose products manufacturing facility may elect to provide classroom instructions for all workers directly impacted by the requirements; however, the rule does not require specific training itself.

ATTACHMENT 3

Methods Used in Cost Estimates

METHODS USED IN COST ESTIMATES

(a) Costs for Monitoring Equipment

The capital costs for the monitoring equipment were estimated based on methods and assumptions presented in the memorandum "Revised Costs and Environmental Impacts of Control Technology Options for the Cellulose Products Manufacturing Industry." (See docket no. A-99-39, item no. IV-B-09.) Facilities were assumed to choose to monitor control device operating parameters instead of operating CEMS. Table 1 presents the capital costs for monitoring equipment estimated for each facility in the cellulose products manufacturing industry.

The annualized capital costs for monitoring equipment were calculated as a sum of the capital recovery cost, administrative charges, insurance, and property taxes. The capital recovery cost was determined as a product of a capital recovery factor and the total capital cost. The capital recovery factor was estimated to be 0.2439, based on a 5-year equipment life and 7 percent interest rate. The administrative charges, insurance, and property taxes were calculated as 4 percent of the capital cost. Table 1 presents the annualized capital costs for monitoring equipment estimated for each facility in the cellulose products manufacturing industry.

Using these estimated costs, the capital and annualized capital costs for monitoring equipment for the first 6 years after the effective date of the rule were estimated as shown in Table 3.

(b) Costs for File Cabinets

The capital costs associated with file cabinets for storing collected data and reports include the purchase of one standard four-drawer file cabinet for each facility. A capital cost of $235 was assumed per file cabinet. The annualized capital costs

for monitoring equipment were calculated as a sum of the capital recovery cost, administrative charges, insurance, and property taxes. The capital recovery cost was determined as a product of a capital recovery factor and the total capital cost. The capital recovery factor was estimated to be 0.1098, based on a 15-year equipment life and 7 percent interest rate. The administrative charges, insurance, and property taxes were calculated as 4 percent of the capital cost. The average annualized capital cost per facility for file cabinets was estimated to be $35. By applying these unit costs to the 13 facilities subject to the cellulose products manufacturing NESHAP, the capital costs for file cabinets were estimated to be $3,055, and the annualized capital costs were estimated to be $455. Using these estimated costs, the capital and annualized capital costs for file cabinets for the first 6 years after the effective date of the rule were estimated as shown in Table 3.

(c) Costs for Performance Tests

The capital costs associated with performance testing include the costs for organic HAP performance tests for process vents and wastewater systems at cellulose ether facilities and the costs for total sulfide performance tests for process vents at viscose process facilities. Performance test costs were estimated based on the following assumptions:

1. The capital cost per test is $10,000; for process vents, this cost includes the cost for testing both the inlet and outlet of the control device.
2. One performance test will be performed for each process vent control device and each wastewater system, as applicable.
3. Ten facilities (four cellulose ether facilities and six viscose process facilities) will be required to conduct an initial performance test for their process vents.

4. Four cellulose ether facilities will be required to conduct an initial performance test for their wastewater systems.
5. No performance test is required for three viscose process facilities, which are using recovery devices to meet the process vent emission limit; these three facilities will be required to conduct an initial compliance demonstration based on the material balance for their process; the cost for the initial compliance demonstration is included in the notification of compliance status labor cost in Table 1a of Attachment 4.
6. The facilities required to conduct an initial performance test will conduct the test during the fourth year after the effective date of the rule (i.e., the first year after their compliance date).
7. Based on the assumptions that 5 percent of the 10 testing facilities will fail the first test and 50 percent of the failing facilities will conduct a retest, no facilities are expected to have to retest.

To determine the total capital cost for performance tests, the unit cost ($10,000) was applied to the process vent control devices at each of the 10 cellulose products manufacturing facilities and to the wastewater system at each of the 4 cellulose ether facilities as shown in Table 2. Using a capital recovery factor of 0.1098, the average annualized capital cost per facility for performance tests was estimated. Because no equipment is purchased, no administrative charges, insurance, or property taxes were estimated for performance testing. Using these estimated costs, the capital and annualized capital costs for performance testing for the first 6 years after the effective date of the rule were estimated as shown in Table 3.

(d) Costs for Operation and Maintenance

Operation and maintenance costs include those costs associated with the general upkeep of capital equipment, such as monitoring equipment. These costs would include monitoring labor, maintenance materials and supplies, recordkeeping and reporting, and overhead for the monitoring equipment. The monitoring O&M costs were estimated based on methods and assumptions presented in the memorandum "Revised Costs and Environmental Impacts of Control Technology Options for the Cellulose Products Manufacturing Industry." (See docket no. A-99-39, item no. IV-B-09.) Table 4 presents the annual monitoring O&M costs estimated for each facility in the cellulose products manufacturing industry. Using these estimated costs, the monitoring O&M costs for the first 6 years after the effective date of the rule were estimated as shown in Table 6.

Operation and maintenance costs also include the costs associated with the paperwork requirement incurred continuously over the life of the ICR. The O&M costs for rules that require respondents to submit reports to EPA and maintain records are estimated as costs for file storage, photocopying, and postage. File storage and photocopying costs per response were estimated at 0.5 hour of clerical labor at a wage rate of $30.18/hr. First class postage was estimated at $7.63 per response for mailing to regulatory agencies. Table 5 presents the annual file storage, photocopy, and postage O&M costs for the cellulose products manufacturing industry. Using these estimated costs, the file storage, photocopying, and postage O&M costs for the first 6 years after the effective date of the rule were estimated as shown in Table 6.

TABLE 1. MONITORING EQUIPMENT COSTS

Industry	Facility	Facility location	Capital cost	Annualized capital cost [a]
Cellulose food casing	Devro-Teepak, Inc.	Danville, IL	$90,383	$25,659
	Viskase Corp.	Loudon, TN	$38,457	$10,918
	Viskase Corp.	Osceola, AR	$31,523	$8,950
Rayon	Lenzing Fibers Corp.	Lowland, TN	$36,306	$10,307
Cellulosic sponge	Nylonge Corp.	Elyria, IL	$168,791	$47,920
	Spontex, Inc.	Columbia, TN	$21,198	$6,018
	3M Corp.	Prairie du Chien, WI	$21,198	$6,018
	3M Corp.	Tonawanda, NY	$25,367	$7,202
Cellophane	UCB Films, Inc.	Tecumseh, KS	$40,746	$11,568
Cellulose ether	Dow Chemical Co.	Institute, WV	$18,866	$5,356
	Dow Chemical Co.	Midland, MI	$36,167	$10,268
	Dow Chemical Co.	Plaquemine, LA	$36,794	$10,446
	Hercules Inc.	Hopewell, VA	$30,875	$8,765
Total			$596,672	$169,394

[a] Annualized capital cost for monitoring equipment = 0.2839 * capital cost.

TABLE 2. PERFORMANCE TEST COSTS[a]

Industry	Facility	Facility location	Process vent control devices to test	Wastewater systems to test	Capital cost[b]	Annualized capital cost[c]
Cellulose food casing	Devro-Teepak, Inc.	Danville, IL	11	--	$110,000	$12,078
	Viskase Corp.	Loudon, TN	4	--	$40,000	$4,392
	Viskase Corp.	Osceola, AR	3	--	$30,000	$3,294
Cellulosic sponge	Nylonge Corp.	Elyria, IL	2	--	$20,000	$2,196
	Spontex, Inc.	Columbia, TN	2	--	$20,000	$2,196
	3M Corp.	Prairie du Chien, WI	2	--	$20,000	$2,196
Cellulose ether	Dow Chemical Co.	Institute, WV	4	1	$50,000	$5,490
	Dow Chemical Co.	Midland, MI	5	1	$60,000	$6,588
	Dow Chemical Co.	Plaquemine, LA	6	1	$70,000	$7,686
	Hercules Inc.	Hopewell, VA	16	1	$170,000	$18,666
Total					$590,000	$64,782

[a] No performance test will be required for Lenzing Fibers Corp., 3M Corp. (Tonawanda, NY), and UCB Films, Inc. because these three facilities are using recovery devices to meet the emission limit; these three facilities will only be required to conduct an initial compliance demonstration based on the material balance for their process.

[b] Unit capital cost of performance test is $10,000.

[c] Annualized capital cost for performance tests = 0.1098 * capital cost.

TABLE 3. CAPITAL AND ANNUALIZED CAPITAL COSTS FOR THE FIRST 6 YEARS AFTER THE EFFECTIVE DATE

Capital cost	Monitoring equipment	File cabinets	Performance tests	Total capital cost
Year 1	$0	$0	$0	$0
Year 2	$0	$0	$0	$0
Year 3	$596,671	$3,055	$0	$599,726
TOTAL (Years 1-3)	$596,671	$3,055	$0	$599,726
Year 4	$0	$0	$590,000	$590,000
Year 5	$0	$0	$0	$0
Year 6	$0	$0	$0	$0
TOTAL (Years 4-6)	$0	$0	$590,000	$590,000
Annualized capital cost	**Monitoring equipment**	**File cabinets**	**Performance tests**	**Total annualized capital cost**
Year 1	$0	$0	$0	$0
Year 2	$0	$0	$0	$0
Year 3	$169,394	$455	$0	$169,849
AVERAGE (Years 1-3)	$56,465	$152	$0	$56,616
Year 4	$169,394	$455	$64,782	$234,631
Year 5	$169,394	$455	$64,782	$234,631
Year 6	$169,394	$455	$64,782	$234,631
AVERAGE (Years 4-6)	$169,394	$455	$64,782	$234,631

TABLE 4. MONITORING O&M COSTS

Industry	Facility	Facility location	O&M cost[a]
Cellulose food casing	Devro-Teepak, Inc.	Danville, IL	$40,315
	Viskase Corp.	Loudon, TN	$14,639
	Viskase Corp.	Osceola, AR	$11,106
Rayon	Lenzing Fibers Corp.	Lowland, TN	$3,671
Cellulosic sponge	Nylonge Corp.	Elyria, IL	$89,181
	Spontex, Inc.	Columbia, TN	$6,448
	3M Corp.	Prairie du Chien, WI	$5,936
	3M Corp.	Tonawanda, NY	$9,205
Cellophane	UCB Films, Inc.	Tecumseh, KS	$13,159
Cellulose ether	Dow Chemical Co.	Institute, WV	$1,986
	Dow Chemical Co.	Midland, MI	$12,218
	Dow Chemical Co.	Plaquemine, LA	$12,302
	Hercules Inc.	Hopewell, VA	$3,390
Total			$223,556

[a] Monitoring O&M cost includes costs for operating labor, maintenance labor, maintenance materials and supplies, recordkeeping and reporting, and overhead.

TABLE 5. FILE&STORAGE, PHOTOCOPY, AND POSTAGE O&M COSTS

Cost item	File storage and photocopy cost/ response[a]	Postage cost/ response	Responses/ respondent	Respondents/ year	Responses/ year	File storage and photocopy cost	Postage cost	Total cost[b]
Notification of applicability	$15.09	$7.63	1	13	13	$196	$99	$295
Notification of performance test	$15.09	$7.63	1	14	14	$211	$107	$318
Notification of compliance status	$15.09	$7.63	1	13	13	$196	$99	$295
Semiannual compliance report	$15.09	$7.63	2	13	26	$392	$198	$591

[a] File storage and photocopy cost/response = 0.5 hr/response * $30.18/hr = $15.09/response.
[b] Numbers may not add exactly due to rounding.

TABLE 6. O&M COSTS FOR THE FIRST 6 YEARS AFTER THE EFFECTIVE DATE

	Monitoring O&M cost	File storage, photocopy, and postage O&M cost					Total O&M cost
		Notification of applicability	Notification of performance test	Notification of compliance status	Semiannual compliance report	Total	
Year 1	$0	$295	$0	$0	$0	$295	$295
Year 2	$0	$0	$0	$0	$0	$0	$0
Year 3	$0	$0	$318	$0	$0	$318	$318
AVERAGE (Years 1-3)	$0	$98	$106	$0	$0	$204	$204
Year 4	$223,556	$0	$0	$295	$591	$886	$224,442
Year 5	$223,556	$0	$0	$0	$591	$591	$224,147
Year 6	$223,556	$0	$0	$0	$591	$591	$224,147
AVERAGE (Years 4-6)	$223,556	$0	$0	$98	$591	$689	$224,245

ATTACHMENT 4

Burden and Cost of Reporting and Recordkeeping Requirements for the Fourth, Fifth, and Sixth Years after the Effective Date

BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS FOR THE FOURTH, FIFTH, AND SIXTH YEARS AFTER THE EFFECTIVE DATE

1. The Information Collected--Respondent Activities and Agency Activities

(a) Respondent Activities

As shown in Part A of the Supporting Statement, there are two one-time notifications that existing sources must complete in the 3 years between the effective date of the rule and the compliance date for existing sources. These notifications include: (1) determining applicability and notifying EPA that the facility is subject to the rule and (2) notifying EPA of upcoming performance tests.

In the fourth, fifth, and sixth years after the effective date of the rule (i.e., the 3 years after the existing source compliance date), existing sources must submit other one-time notifications and reports, and ongoing recordkeeping and reporting begins. In the fourth year after the effective date of the rule, existing sources will conduct their performance tests or other initial compliance demonstrations and submit their initial notifications of compliance status. Existing sources also will begin ongoing monitoring and recordkeeping for various operating parameters, equipment leaks, etc. The sources will begin to submit semiannual reports that include information about deviations, periods of SSM, wastewater, equipment leaks, etc.

The respondent activities required by the rule for existing major sources in the fourth, fifth, and sixth years after the effective date of the rule are listed in Tables 1a and 1b of this attachment. Table 1a presents the respondent activities for the fourth year after the effective date of the rule, and Table 1b presents the respondent activities for the fifth and sixth years after the effective date of the rule. The EPA does not expect

any difference in respondent activities for the fifth and sixth years after the effective date of the rule. The respondent activities are described in more detail in Attachment 2, Description of Respondent Activities. No new major source cellulose products manufacturing facilities are projected to be built within the next 5 years.

TABLE 1a. ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS--FOURTH YEAR AFTER THE EFFECTIVE DATE

Burden item	(A) Technical hours per occurrence	(B) Occurrences per respondent per year	(C) Technical hours per respondent per year (C = A * B)	(D) Respondents per year [a]	(E) Technical hours per year (E = C * D)	(F) Management hours per year (F = E * 0.05)	(G) Clerical hours per year (G = E * 0.1)	(H) Respondent hours per year (H = E + F + G)	(I) Labor cost, $ [b]
1. Applications	N/A								
2. Surveys and studies	N/A								
3. Reporting requirements									
A. Read instructions	N/A								
B. Required activities									
• Initial compliance demonstration	Included in 3E								
C. Create information	Included in 3E								
D. Gather existing information	Included in 3E								
E. Write report									
• Notification of compliance status									
With performance test [c]	80	1	80	14	1,120	56	112	1,288	$60,925
Without performance test [d]	160	1	160	9	1,440	72	144	1,656	$78,332
• Semiannual compliance report									
No deviations [e]	8	2	16	10	160	8	16	184	$8,704
Deviations [e]	16	2	48	3	96	5	10	110	$5,222
SSM [f]	8	2	16	13	208	10	21	239	$11,315
Equipment leaks [g]	303	2	606	4	2,424	121	242	2,788	$131,858
Wastewater	Included in 4E								
Other [h]	8	2	16	13	208	10	21	239	$11,315
4. Recordkeeping requirements									
A. Read instructions	N/A								
B. Plan activities	N/A								
C. Implement activities	N/A								

TABLE 1a. (continued)

Burden item	(A) Technical hours per occurrence	(B) Occurrences per respondent per year	(C) Technical hours per respondent per year (C = A * B)	(D) Respondents per year [a]	(E) Technical hours per year (E = C * D)	(F) Management hours per year (F = E * 0.05)	(G) Clerical hours per year (G = E * 0.1)	(H) Respondent hours per year (H = E + F + G)	(I) Labor cost, $ [b]
D. Develop record system	N/A								
E. Time to enter information	N/A								
• Records of SSM [i]	1.5	52	78	13	1,014	51	101	1,166	$55,159
• Records of CPMS data [j]									
Record continuously monitored parameters	1	365	365	13	4,745	237	475	5,457	$258,114
Compile data	24	2	48	13	624	31	62	718	$33,944
Enter/verify information for semiannual report	16	2	32	13	416	21	42	478	$22,629
• Records of closed-loop systems [k]	2	2	4	1	2	0.1	0.2	2	$109
• Records of nitrogen systems [l]	2	2	4	9	18	0.9	2	21	$979
• Records of material balances [m]	8	2	16	9	144	7	14	166	$7,833
• Records of supporting calculations [n]	8	2	16	13	208	10	21	239	$11,315
• Records for extended cookout [o]	8	2	16	1	16	0.8	2	18	$870
• Records for equipment leaks	Included in 3E								
• Other records	Included in 3E								
F. Time for refresher training for personnel [p]	16	1	16	13	208	10	21	239	$11,315
G. Time for audits	N/A								
Total burden and cost nationwide (salary) [q]					13,051	653	1,305	15,009	$709,935
Average cost per facility [r]				13					$54,610

[a] There are 13 existing major source cellulose products manufacturing facilities, which include 3 cellulose food casing, 1 rayon, 1 cellophane, 4 cellulosic sponge, and 4 cellulose ether facilities). No new major source cellulose manufacturing facilities are projected to be built within the next 5 years.

[b] Costs assume a rate of $47.75/hour for technical labor, $72.58/hour for management labor, and $30.18/hour for clerical labor.

 TABLE 1a. (continued)

[c] Respondents per year are based on 6 viscose process facilities conducting a performance test for their process vents and 4 cellulose ether facilities conducting separate performance tests for their process vents and wastewater systems, with the facilities submitting one notification of compliance status for all performance tests conducted at the facility. The notification of compliance status includes the reports of all of these performance tests.

[d] Respondents per year are based on 9 viscose process facilities conducting an initial compliance demonstration for their process vents based on the material balance for their facility. The notification of compliance status includes the material balance calculations conducted at the facility.

[e] Occurrences per respondent are based on having semiannual report submitted twice each year. Respondents per year assume that 20 percent of the respondents will have deviations from the standard, and 80 percent will have no deviations.

[f] Hours per occurrence assume that the hours for SSM report are the same as for semiannual report of no deviations. Occurrences per respondent are based on having it submitted with semiannual report twice each year. Respondents per year are based on every facility submitting an SSM report.

[g] According to EPA guidance, annual recordkeeping and reporting costs for the LDAR program are estimated to be 40 percent of monitoring and repair labor (40% * $165,037 = $66,015 total and $16,504 per facility). Hours per occurrence are based on this cost divided by the composite hourly labor rate ($47.75 + 0.05 * $72.58 + 0.1 * $30.18 = $54.40). Respondents per year are based on the 4 cellulose ether facilities subject to LDAR requirements.

[h] Other reports include reports on changes in information, closed-vent systems, bypass lines, heat exchanger systems, and storage vessel control device maintenance. Hours per occurrence are assumed to be 8 hours, and respondents per year are assumed to include all 13 respondents.

[i] Occurrences per respondent are based on weekly records of SSM.

[j] Includes process vent, storage tank, and wastewater monitoring and inspections. Occurrences per respondent are based on daily records of parameters and compiling, entering, and verifying data for semiannual report.

[k] Hours per occurrence are assumed to be 2 hours, and respondents per year are based on the 1 cellulose ether facility with a closed-loop system.

[l] Hours per occurrence are assumed to be 2 hours, and respondents per year are based on the 9 viscose process facilities with CS_2 unloading and storage operations.

[m] Hours per occurrence are assumed to be 8 hours, and respondents per year are based on the 9 viscose process facilities complying by using material balances.

[n] Hours per occurrence are assumed to be 8 hours, and respondents per year are assumed to include all 13 respondents.

[o] Hours per occurrence are assumed to be 8 hours, and respondents per year are based on the 1 cellulose ether facility that uses extended cookout.

[p] Hours per occurrence assumes 2 days (16 hours) to provide refresher training for personnel.

[q] The annual burden and cost are equal to the hours added down each column for technical, management, and clerical labor and the sum of the cost column.

[r] The average cost per facility is calculated by dividing the total cost by the number of facilities (13) subject to the standards.

TABLE 1b. ANNUAL RESPONDENT BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS--FIFTH AND SIXTH YEARS AFTER THE EFFECTIVE DATE

Burden item	(A) Technical hours per occurrence	(B) Occurrences per respondent per year	(C) Technical hours per respondent per year (C = A * B)	(D) Respondents per year [a]	(E) Technical hours per year (E = C * D)	(F) Management hours per year (F = E * 0.05)	(G) Clerical hours per year (G = E * 0.1)	(H) Respondent hours per year (H = E + F + G)	(I) Labor cost, $ [b]
1. Applications	N/A								
2. Surveys and studies	N/A								
3. Reporting requirements									
A. Read instructions	N/A								
B. Required activities	N/A								
C. Create information	Included in 3E								
D. Gather existing information	Included in 3E								
E. Write report									
• Semiannual compliance report									
No deviations [c]	8	2	16	10	160	8	16	184	$8,704
Deviations [c]	16	2	48	3	96	5	10	110	$5,222
SSM [d]	8	2	16	13	208	10	21	239	$11,315
Equipment leaks [e]	303	2	606	4	2,424	121	242	2,788	$131,858
Wastewater	Included in 4E								
Other [f]	8	2	16	13	208	10	21	239	$11,315
4. Recordkeeping requirements									
A. Read instructions	N/A								
B. Plan activities	N/A								
C. Implement activities	N/A								
D. Develop record system	N/A								

TABLE 1b. (continued)

Burden item	(A) Technical hours per occurrence	(B) Occurrences per respondent per year	(C) Technical hours per respondent per year (C = A * B)	(D) Respondents per year [a]	(E) Technical hours per year (E = C * D)	(F) Management hours per year (F = E * 0.05)	(G) Clerical hours per year (G = E * 0.1)	(H) Respondent hours per year (H = E + F + G)	(I) Labor cost, $ [b]
E. Time to enter information									
• Records of SSM [g]	1.5	52	78	13	1,014	51	101	1,166	$55,159
• Records of CPMS data [h]									
Record continuously monitored parameters	1	365	365	13	4,745	237	475	5,457	$258,114
Compile data	24	2	48	13	624	31	62	718	$33,944
Enter/verify information for semiannual report	16	2	32	13	416	21	42	478	$22,629
• Records of closed-loop systems [i]	2	2	4	1	2	0.1	0.2	2	$109
• Records of nitrogen systems [j]	2	2	4	9	18	0.9	2	21	$979
• Records of material balances [k]	8	2	16	9	144	7	14	166	$7,833
• Records of supporting calculations [l]	8	2	16	13	208	10	21	239	$11,315
• Records for extended cookout [m]	8	2	16	1	16	0.8	2	18	$870
• Records for equipment leaks	Included in 3E								
• Other records	Included in 3E								
F. Time for refresher training for personnel [n]	16	1	16	13	208	10	21	239	$11,315
G. Time for audits	N/A								
Total burden and cost nationwide (salary) [o]					10,491	525	1,049	12,065	$570,679
Average cost per facility [p]				13					$43,898

[a] There are 13 existing major source cellulose products manufacturing facilities, which include 3 cellulose food casing, 1 rayon, 1 cellophane, 4 cellulosic sponge, and 4 cellulose ether facilities. No new major source cellulose manufacturing facilities are projected to be built within the next 5 years.

[b] Costs assume a rate of $47.75/hour for technical labor, $72.58/hour for management labor, and $30.18/hour for clerical labor.

 TABLE 1b. (continued)

[c] Occurrences per respondent are based on having semiannual report submitted twice each year. Respondents per year assume that 20 percent of the respondents will have deviations from the standard, and 80 percent will have no deviations.

[d] Hours per occurrence assume that the hours for SSM report are the same as for semiannual report of no deviations. Occurrences per respondent are based on having it submitted with semiannual report twice each year. Respondents per year are based on every facility submitting an SSM report.

[e] According to EPA guidance, annual recordkeeping and reporting costs for the LDAR program are estimated to be 40 percent of monitoring and repair labor (40% * $165,037 = $66,015 total and $16,504 per facility). Hours per occurrence are based on this cost divided by the composite hourly labor rate ($47.75 + 0.05 * $72.58 + 0.1 * $30.18 = $54.40). Respondents per year are based on the 4 cellulose ether facilities subject to LDAR requirements.

[f] Other reports include reports on changes in information, closed-vent systems, bypass lines, heat exchanger systems, and storage vessel control device maintenance. Hours per occurrence are assumed to be 8 hours, and respondents per year are assumed to include all 13 respondents.

[g] Occurrences per respondent are based on weekly records of SSM.

[h] Includes process vent, storage tank, and wastewater monitoring and inspections. Occurrences per respondent are based on daily records of parameters and compiling, entering, and verifying data for semiannual report.

[i] Hours per occurrence are assumed to be 2 hours, and respondents per year are based on the 1 cellulose ether facility with a closed-loop system.

[j] Hours per occurrence are assumed to be 2 hours, and respondents per year are based on the 9 viscose process facilities with CS_2 unloading and storage operations.

[k] Hours per occurrence are assumed to be 8 hours, and respondents per year are based on the 9 viscose process facilities complying by using material balances.

[l] Hours per occurrence are assumed to be 8 hours, and respondents per year are assumed to include all 13 respondents.

[m] Hours per occurrence are assumed to be 8 hours, and respondents per year are based on the 1 cellulose ether facility that uses extended cookout.

[n] Hours per occurrence assumes 2 days (16 hours) to provide refresher training for personnel.

[o] The annual burden and cost are equal to the hours added down each column for technical, management, and clerical labor and the sum of the cost column.

[p] The average cost per facility is calculated by dividing the total cost by the number of facilities (13) subject to the standards.

(b) Agency Activities

As shown in Part A of the Supporting Statement, in the 3 years between the effective date of the rule and compliance date for existing sources, EPA will review the notifications of applicability and the notifications of performance tests submitted by existing sources.

In the fourth, fifth, and sixth years after the effective date of the rule (i.e., the 3 years after the existing source compliance date), EPA will review other notifications and reports submitted by existing sources. In the fourth year after the effective date of the rule, EPA will review the notifications of compliance status and semiannual compliance reports for existing sources. The EPA will continue to review the semiannual compliance reports in the fifth and sixth years after the effective date of the rule.

The Agency activities for the fourth, fifth, and sixth years after the effective date of the rule are listed in Tables 2a and 2b of this attachment. Table 2a presents the Agency activities for the fourth year after the effective date of the rule. Table 2b presents the Agency activities for the fifth and sixth year after the effective date of the rule. The EPA does not expect any difference in Agency activities for the fifth and sixth years after the effective date of the rule.

TABLE 2a. ANNUAL AGENCY BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS--FOURTH YEAR AFTER THE EFFECTIVE DATE

Burden item	(A) Hours per occurrence	(B) Occurrences per year	(C) Hours per facility per year (C = A * B)	(D) Facilities per year [a]	(E) Technical hours per year (E = C * D)	(F) Management hours per year (F = E * 0.05)	(G) Clerical hours per year (G = E * 0.1)	(H) Agency hours per year (H = E + F + G)	(I) Labor cost per year, $ [b]
1. Attend initial performance test [c]	40	1	40	1	40	2	4	46	$2,176
2. Attend repeat performance test [d]	40	1	40	0	0	0	0	0	$0
3. Litigation [e]	2,080	1	2,080	0	0	0	0	0	$0
4. Excess emissions--enforcement activities [f]	120	1	120	0	0	0	0	0	$0
5. Report review									
A. Review notification of compliance status									
• With performance test [g]	40	1	40	14	560	28	56	644	$30,462
• Without performance test [h]	40	1	40	9	360	18	36	414	$19,583
B. Review semiannual compliance report									
• No deviations [i]	2	2	4	10	40	2	4	46	$2,176
• Deviations [i]	8	2	16	3	48	2	5	55	$2,611
• SSM [j]	2	2	4	13	52	3	5	60	$2,829
• Equipment leaks [k]	8	2	16	4	64	3	6	74	$3,481
• Wastewater [k]	8	2	16	4	64	3	6	74	$3,481
• Other [l]	2	2	4	13	52	3	5	60	$2,829
Total burden and cost (salary) [m]					1,280	64	128	1,472	$69,628
Travel expenses for tests attended [n]									$500
Total cost = total cost (salary) + travel expenses									$70,128

[a] There are 13 existing major source cellulose products manufacturing facilities, which include 3 cellulose food casing, 1 rayon, 1 cellophane, 4 cellulosic sponge, and 4 cellulose ether facilities. No new major source cellulose manufacturing facilities are projected to be built within the next 5 years.

[b] Costs assume a rate of $47.75/hour for technical labor, $72.58/hour for management labor, and $30.18/hour for clerical labor.

[c] Facilities per year assumes EPA personnel will attend 8 percent of initial performance tests (0.08 * 13 facilities = 1 facility).

[d] Facilities per year assumes that 5 percent of facilities will fail the first performance test and 50 percent of these facilities will repeat the test, and EPA personnel will attend 10 percent of the retests (0.05 * 0.5 * 0.1 * 10 facilities = 0 facilities).

[e] Facilities per year assume that 1 percent of the affected facilities will be involved in litigation (0.01 * 13 facilities = 0 facilities).

TABLE 2a. (continued)

[f] Facilities per year assumed that 10 percent of the affected facilities will be required to retest as a result of deviations, and EPA personnel will attend 10 percent of these tests (0.1 * 0.1 * 13 facilities = 0 facilities).

[g] Facilities per year are based on 6 viscose process facilities conducting a performance test for their process vents and 4 cellulose ether facilities conducting separate performance tests for their process vents and wastewater systems, with the facilities submitting one notification of compliance status for all performance tests conducted at the facility. The notification of compliance status includes the reports of all of these performance tests.

[h] Facilities per year are based on 9 viscose process facilities conducting an initial compliance demonstration based on the material balance for their facility. The notification of compliance status includes the material balance calculations.

[i] Occurrences per respondent are based on having semiannual report submitted twice each year. Facilities per year assume that 20 percent of the facilities will have deviations from the standard, and 80 percent will have no deviations.

[j] Hours per occurrence assume that the hours to review SSM report are the same as for semiannual report of no deviations. Occurrences per respondent are based on having it submitted with semiannual report twice each year. Facilities per year are based on every facility submitting an SSM report.

[k] Hours per occurrence are assumed to be 8 hours, and facilities per year are based on the 4 cellulose ether facilities subject to LDAR and wastewater requirements.

[l] Other reports include reports on changes in information, closed-vent systems, bypass lines, heat exchanger systems, and storage vessel control device maintenance. Hours per occurrence are assumed to be 8 hours, and facilities per year are assumed to include all 13 respondents.

[m] The annual burden and cost are equal to the hours added down each column for technical, management, and clerical labor and the sum of the cost column.

[n] Tests attended = 1 initial test + 0 repeat tests + 0 excess emissions enforcement tests = 1 test. Travel expenses for tests attended = (one person * 1 test/yr * 2 days/test * $50 per diem) + ($400/round trip * 1 round trips/yr) = $500.

TABLE 2b. ANNUAL AGENCY BURDEN AND COST OF REPORTING AND RECORDKEEPING REQUIREMENTS--FIFTH AND SIXTH YEARS AFTER THE EFFECTIVE DATE

Burden item	(A) Hours per occurrence	(B) Occurrences per year	(C) Hours per facility per year (C = A * B)	(D) Facilities per year [a]	(E) Technical hours per year (E = C * D)	(F) Management hours per year (F = E * 0.05)	(G) Clerical hours per year (G = E * 0.1)	(H) Agency hours per year (H = E + F + G)	(I) Labor cost per year, $ [b]
1. Attend initial performance test	N/A								
2. Attend repeat performance test	N/A								
3. Litigation [c]	2,080	1	2,080	0	0	0	0	0	$0
4. Excess emissions--enforcement activities [d]	120	1	120	0	0	0	0	0	$0
5. Report review									
A. Review semiannual compliance report									
• No deviations [e]	2	2	4	10	40	2	4	46	$2,176
• Deviations [e]	8	2	16	3	48	2	5	55	$2,611
• SSM [f]	2	2	4	13	52	3	5	60	$2,829
• Equipment leaks [g]	8	2	16	4	64	3	6	74	$3,481
• Wastewater [g]	8	2	16	4	64	3	6	74	$3,481
• Other [h]	2	2	4	13	52	3	5	60	$2,829
Total burden and cost (salary) [i]					320	16	32	368	$17,407
Travel expenses for tests attended									$0
Total cost = total cost (salary) + travel expenses									$17,407

[a] There are 13 existing major source cellulose products manufacturing facilities, which include 3 cellulose food casing, 1 rayon, 1 cellophane, 4 cellulosic sponge, and 4 cellulose ether facilities. No new major source cellulose manufacturing facilities are projected to be built within the next 5 years.

[b] Costs assume a rate of $47.75/hour for technical labor, $72.58/hour for management labor, and $30.18/hour for clerical labor.

[c] Facilities per year assume that 1 percent of the affected facilities will be involved in litigation (0.01 * 13 facilities = 0 facilities).

[d] Facilities per year assumed that 10 percent of the affected facilities will be required to retest as a result of deviations, and EPA personnel will attend 10 percent of these tests (0.1 * 0.1 * 13 facilities = 0 facilities).

[e] Occurrences per respondent are based on having semiannual report submitted twice each year. Facilities per year assume that 20 percent of the facilities will have deviations from the standard, and 80 percent will have no deviations.

[f] Hours per occurrence assume that the hours to review SSM report are the same as for semiannual report of no deviations. Occurrences per respondent are based on having it submitted with semiannual report twice each year. Facilities per year are based on every facility submitting an SSM report.

[g] Hours per occurrence are assumed to be 8 hours, and facilities per year are based on the 4 cellulose ether facilities subject to LDAR and wastewater requirements.

TABLE 2b. (continued)

[h] Other reports include reports on changes in information, closed-vent systems, bypass lines, heat exchanger systems, and storage vessel control device maintenance. Hours per occurrence are assumed to be 8 hours, and facilities per year are assumed to include all 13 respondents.

[i] The annual burden and cost are equal to the hours added down each column for technical, management, and clerical labor and the sum of the cost column.

2. Estimating the Burden and Cost of the Collection

(a) Estimating Respondent Burden and Costs

(i) Estimating respondent burden and labor costs. Tables 1a and 1b of this attachment present the annual burden estimates and costs for reporting and recordkeeping activities for existing major sources for the fourth, fifth, and sixth years after the effective date of the rule. Table 1a presents the estimated burden and costs to the industry during the fourth year after the effective date of the rule. Table 1b presents the estimated burden and costs to the industry during the fifth and sixth years after the effective date of the rule. The burden estimates in each table were derived from estimates based on EPA's experience with similar information collection requirements in other standard development efforts.

The costs of the reporting and recordkeeping activities are based on data from the U.S. Bureau of Labor Statistics. Labor costs are divided into the following three categories: (1) technical, (2) management, and (3) clerical. The cost of technical labor is estimated at $47.75/hr, the cost of management labor at $72.58/hr, and the cost of clerical labor at $30.18/hr. These estimates include fringe benefits, overhead, and profit rate. The labor costs are in March 2000 dollars.

(ii) Estimating capital and O&M costs. There are two types of non-labor-related costs associated with information collection activities--capital costs and O&M costs. The methods used to estimate the capital and O&M costs for this ICR are presented in Attachment 3, Methods Used in Cost Estimates.

One-time capital costs usually include any produced physical good, such as computers, machinery, or equipment, that must be purchased for the specific purpose of satisfying EPA's reporting or recordkeeping requirements. Capital costs are usually incurred only once, at the beginning of an information collection

period. A one-time capital cost can be estimated over multiple years by annualizing the cost using an OMB-approved discount rate. For this ICR, capital costs were annualized using an interest rate of 7 percent. In most cases, administrative charges, insurance, and property taxes were also included with the annualized capital costs, estimated at 4 percent of the capital cost.

The capital costs associated with monitoring equipment include the monitoring equipment, data acquisition system, computer, logging and reporting software, printer, and ancillary costs, such as planning, selecting the equipment, providing support facilities, installing and checking the equipment, establishing operating parameters, and preparing a QA/QC plan. Capital and annualized capital costs associated with monitoring equipment are expected to be incurred in the third year after the effective date of the rule as existing facilities purchase, install, and check out their monitoring equipment prior to their compliance date. Annualized capital costs associated with monitoring equipment also are expected to be incurred during the fourth, fifth, and sixth years after the effective date of the rule (i.e., the 3 years after the existing source compliance date).

The capital costs associated with file cabinets for storing collected data and reports include the purchase of one standard four-drawer file cabinet for each facility (assume $235 per file cabinet). The average annualized capital cost per facility for file cabinets is $35. Capital and annualized capital costs associated with file cabinets are expected to be incurred in the third year after the effective date of the rule as existing facilities develop their record systems prior to their compliance date. Annualized capital costs associated with file cabinets also are expected to be incurred during the fourth, fifth, and

sixth years after the effective date of the rule (i.e., the 3 years after the existing source compliance date).

Costs for performance testing are also considered capital costs because it is expected that facilities will hire a contractor to conduct the test. The capital costs associated with performance testing include the costs for organic HAP performance tests for process vents and wastewater systems at cellulose ether facilities and the costs for total sulfide performance tests for process vents at viscose process facilities. Performance test costs were estimated based on the following assumptions: (1) the capital cost per test is $10,000; for process vents, this cost includes the cost for testing both the inlet and outlet of the control device; (2) one performance test will be performed for each wastewater system and each process vent control device; (3) 10 facilities (4 cellulose ether facilities and 6 viscose process facilities) will be required to conduct an initial performance test for their process vents; (4) 4 cellulose ether facilities will be required to conduct an initial performance test for their wastewater systems; (5) no performance test is required for three viscose process facilities, which are using recovery devices to meet the emission limit; these three facilities will be required to conduct an initial compliance demonstration based on the material balance for their process; the cost for the initial compliance demonstration is included in the notification of compliance status labor cost in Table 1a of this attachment; (6) the facilities required to conduct an initial performance test will conduct the test during the fourth year after the effective date of the rule (i.e., the first year after their compliance date); and (7) based on the assumptions that 5 percent of these facilities will fail the first test and 50 percent of the failing facilities will conduct a retest, no facilities are expected to have to retest.

Operation and maintenance costs include those costs associated with the general upkeep of capital equipment, as well as those costs associated with a paperwork requirement incurred continuously over the life of the ICR. For example, the O&M costs for rules that require respondents to submit reports to the Agency and maintain records should be estimated as costs for file storage, photocopying, and postage. File storage and photocopying costs per response are estimated at 0.5 hour of clerical labor at a rate of $30.18/hr. First class postage is estimated at $7.63 per response for mailing to regulatory agencies.

Operation and maintenance costs include those costs associated with the general upkeep of capital equipment, such as monitoring equipment. Those costs would include monitoring labor, maintenance materials and supplies, recordkeeping and reporting, and overhead for the monitoring equipment. Monitoring O&M costs are expected to be incurred during the fourth, fifth, and sixth years after the effective date of the rule (i.e., the 3 years after the existing source compliance date).

Operation and maintenance costs also include the costs associated with a paperwork requirement incurred continuously over the life of the ICR. For example, the O&M costs for rules that require respondents to submit reports to EPA and maintain records should be estimated as costs for file storage, photocopying, and postage. File storage and photocopying costs per response are estimated at 0.5 hour of clerical labor at a rate of $30.18/hr. First class postage is estimated at $7.63 per response for mailing to regulatory agencies. File storage, photocopying, and postage costs will be applied to the 39 responses submitted during the fourth year after the effective date of the rule and the 26 responses submitted during each of the fifth and sixth years after the effective date of the rule. (The number of responses was determined based on the number of

notifications and reports submitted to EPA by respondents, as shown in Tables 1a and 1b of this attachment.)

(b) Estimating Agency Burden and Costs

Tables 2a and 2b of this attachment present the estimated annual Agency burden estimates and costs for the fourth, fifth, and sixth years after the effective date of the rule. Table 2a presents the estimated burden and costs to the Agency during the fourth year after the effective date of the rule. Table 2b presents the estimated burden and costs to the Agency during the fifth and sixth years after the effective date of the rule. The only burden and costs that the Federal Government will incur as a result of the information collection requirements are associated with the analysis of the information reported by respondents in one-time notifications of compliance status and semiannual compliance reports (unless the compliance report indicates a deviation, thereby triggering an enforcement action). Labor costs are based on estimated wage rates of $47.75/hr for technical labor, $72.58/hr for management labor, and $30.18/hr for clerical labor. The labor costs are in March 2000 dollars.

(c) Estimating the Respondent Universe and Total Burden and Costs

Once the burden and costs per activity have been established on a per respondent basis, the total burden and cost must be calculated for all respondents and for the Agency. To calculate the total burden and costs, the number of respondents needed to complete each information collection activity must be estimated. The total number of respondents is also referred to as the "respondent universe." The respondent universe varies among the activities listed because not all respondents must complete each activity.

In estimating respondent burden, EPA estimates that 13 major source cellulose products manufacturing facilities will be required to submit notifications of compliance status and semiannual compliance reports, provide refresher training for personnel, and maintain records. In calculating Agency burden, EPA estimates that EPA personnel will conduct reviews of 13 notifications of compliance status in the fourth year after the effective date of the rule and 13 semiannual compliance reports during the fourth, fifth, and sixth years after the effective date of the rule.

To determine the burden for each activity for technical staff, the number of hours per respondent is multiplied by the number of respondents. Management and clerical labor hours are calculated at 5 percent and 10 percent of technical labor hours, respectively. The total burden is determined by summing the technical, management, and clerical burden estimates. To determine the total labor cost, the burden estimates for technical, management, and clerical labor are multiplied by their respective labor rates and then summed.

(d) Bottom Line Burden Hours and Cost Tables

(i) Respondent tally. The bottom line annual respondent burden hours and costs are calculated by adding the total hours and costs from Table 1a to the total hours and costs from Table 1b multiplied by two, and then dividing by the 3-year period (i.e., fourth, fifth, and sixth years after the effective date of the rule). The total annual burden hours and costs are summarized as follows:

Burden table	Total burden, hours	Total cost, $
Table 1a (fourth year)	15,009	$709,935
Table 1b x 2 (fifth and sixth years)	24,129	$570,679

Total	39,138	$1,280,614
Bottom line annual burden	13,046	$426,871

The bottom line annual burden, averaged over the 3-year period, is 13,046 labor hours, at a cost of $426,871. The average annual burden per respondent, based on 13 respondents over the 3-year period, is 1,004 labor hours, at a cost of $32,836.

There are an estimated 30 total annual responses for the fourth, fifth, and sixth years after the effective date of the rule. The total annual responses are based on an estimated 13 one-time notifications of compliance status and 26 semiannual compliance reports submitted during the fourth year and an estimated 26 semiannual compliance reports submitted during each of the fifth and sixth years. Of these 30 responses, it is assumed that approximately 20 percent will be collected electronically.

The total capital cost for the performance tests is estimated to be $590,000 for the fourth, fifth, and sixth years after the effective date of the rule. The average annualized capital cost for the performance tests is $64,782 for the fourth, fifth, and sixth years after the effective date of the rule. The average annualized capital costs for monitoring equipment and file cabinets (purchased in the third year after the effective date of the rule) are $169,394 and $455, respectively, for the fourth, fifth, and sixth years after the effective date of the rule. Summing the annualized capital costs for the performance tests, monitoring equipment, and file cabinets results in a total annualized capital cost of $234,631 for the fourth, fifth, and sixth years after the effective date of the rule.

The average annual O&M costs for the fourth, fifth, and sixth years after the effective date of the rule are $223,556 for monitoring and $689 for file storage, photocopying, and postage.

Summing these two O&M costs results in a total annual O&M cost of $224,245 for the fourth, fifth, and sixth years after the effective date of the rule.

Summing the total annualized capital cost with the total annual O&M cost results in a total annualized cost of $458,876 for the fourth, fifth, and sixth years after the effective date of the rule.

(ii) The Agency tally. The bottom line annual Agency burden hours and costs are calculated by adding the total hours and costs from Table 2a to the total hours and costs from Table 2b multiplied by two, and then dividing by the 3-year period (i.e., fourth, fifth, and sixth years after the effective date of the rule). The annual burden hours and costs are summarized as follows:

Burden table	Total burden, hours	Total cost, $
Table 2a (fourth year)	1,472	$70,128
Table 2b x 2 (fifth and sixth years)	736	$34,814
Total	2,208	$104,942
Bottom line annual burden	736	$34,981

The bottom line annual burden, averaged over the 3-year period, is 736 labor hours, at a cost of $34,981.

(e) Burden Statement

(i) The total annual reporting and recordkeeping burden and cost for this collection, averaged over the fourth, fifth, and sixth years after the effective date of the rule, are estimated to be 13,046 labor hours and $426,871. The average burden and cost, per respondent, are 1,004 labor hours and $32,836. These burden and cost estimates include submitting one-time

notifications of compliance status, submitting semiannual compliance reports, and recordkeeping.

(ii) The total capital cost for performance tests for the fourth, fifth, and sixth years after the effective date of the rule is $590,000. The annualized capital cost for performance tests, monitoring equipment, and file cabinets, averaged over the fourth, fifth, and sixth years after the effective date of the rule, is $234,631. The annual O&M cost for monitoring, file storage, photocopying, and postage, averaged over the fourth, fifth, and sixth years after the effective date of the rule, is $224,245. Summing the annualized capital cost with the annual O&M cost results in a total annualized cost of $458,876 for the fourth, fifth, and sixth years after the effective date of the rule.